

Exhibit 19

LAWRENCE G. PAPALE
California State Bar No. 67068
LAW OFFICES OF
LAWRENCE G. PAPALE
The Cornerstone Building
1308 Main Street, Suite 117
St. Helena, California 94574
Telephone (707) 963-1704

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION**

Case No. 3:07-cv-5944
MDL No. 1917

CLASS ACTION

This Document Relates to:
All Indirect Purchaser Actions

**DECLARATION OF LAWRENCE G. PAPALE
IN SUPPORT OF PLAINTIFFS'
APPLICATION FOR ATTORNEYS' FEES,
EXPENSES AND INCENTIVE AWARDS**

Judge: Honorable Samuel Conti
Courtroom One, 17th Floor

1 I, LAWRENCE PAPALE, declare as follows:

2 1. I am an attorney licensed to practice before the state courts in California and
3 various federal courts throughout California and the country and I am the principal attorney in the
4 law firm of the Law Offices of Lawrence G. Papale. I have personal knowledge of the facts stated
5 in this declaration and, if called as a witness, I could and would testify competently to them. I
6 make this declaration in support of my firm's request for attorneys' fees and reimbursement of
7 litigation expenses, as set forth in Plaintiffs' Application for Attorneys' Fees, Expenses and
8 Incentive Awards.

9 2. My firm is counsel of record in this case, and represents originally named
10 plaintiff(s) Craig Stephenson, Frank Warner and Daniel Herger. A brief description of my firm is
11 attached as Exhibit 1 and incorporated herein by reference. I have tried or assisted in the trial of
12 the following antitrust cases: Rickards vs. CERF (USDC NDCal), Las Vegas Sun vs. Summa Corp
13 (USDC DNev), Broadway Delivery vs. United Parcel Service (USDC SDNY), Ringsby vs. Yellow
14 Freight Co. (USDC NDCal), Balmoral Cinema, Inc. vs. Allied Artists Pictures Corp., et al. (USDC
15 WDTenn).

16 3. Throughout the course of this litigation, my firm kept files contemporaneously
17 documenting all time spent, including tasks performed, and expenses incurred, and transmitted
18 those reports on a regular basis to Lead Counsel. All of the time and expenses reported by my firm
19 were incurred for the benefit of the Indirect Purchaser Plaintiffs ("IPPs").

20 4. During the course of this litigation, my firm has been involved in the following
21 brief summary of tasks and activities on behalf of the IPPs. All of this work was assigned and/or
22 approved by Lead Counsel.

23 a. Preliminary investigation of claim; research of issues related to litigation;
24 liaison with clients; review and analysis of documents and pleadings filed in litigation; discussions
25 with co-counsel regarding litigation status and strategy; analysis of the marketplace and the market
26 participants, and other industry participants; analysis of facts supporting liability; review,
27 assistance and taking of liability depositions; defense of plaintiffs' depositions; management of
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1 plaintiffs; preparation of trial witness dossiers; preparation of summary exhibits and
2 demonstratives for trial; counsel in settlement negotiations; and claims issues.

3 5. The schedule attached as Exhibit 2, and incorporated herein, is a detailed summary
4 of the amount of time spent by me in this litigation. It does not include any time devoted to
5 preparing this declaration or otherwise pertaining to the Joint Fee Petition. The lodestar
6 calculation is based on my firm's historical billing rates in effect at the time services were
7 performed. Exhibit 2 was prepared from contemporaneous time records regularly prepared and
8 maintained by my firm. Those records have been provided to Lead Counsel and I authorize them
9 to be submitted for inspection by the Court if necessary. The hourly rates for my firm included in
10 Exhibit 2 were, at the time the work was performed, the usual and customary hourly rates charged
11 for their services in similar complex litigation.

12 6. The total number of hours reasonably expended on this litigation by my firm from
13 inception to May 31, 2015 is 1262 hours. The total lodestar for my firm at historical rates is
14 \$850,240.00. The total lodestar for my firm at current rates is \$946,500.00. Expense items are
15 billed separately and are not duplicated in my firm's lodestar.

16 7. The expenses my firm incurred in litigating this action are reflected in the books
17 and records of my firm. These books and records are prepared from expense vouchers, invoices,
18 receipts, check records and other source materials and accurately reflect the expenses incurred.
19 My firm's expense records are available for inspection by the Court if necessary.

20 8. My firm incurred a total of \$24,623.03 in unreimbursed expenses, all of which were
21 reasonable and necessary for the prosecution of this litigation. Of this amount, none was for
22 assessment payments for common litigation expenses or direct payments to experts or other
23 vendors made at the request of Lead Counsel; the entire \$24,623.03 was for non-common litigation
24 expenses incurred by my firm, such as travel, meals and lodging, copying, legal research,
25 telephone, etc. A summary of those expenses by category is attached as Exhibit 3.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed this 20th
2 day of August, 2015, in Saint Helena, California.

3 Lawrence Papale

4 LAWRENCE G. PAPALE
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EXHIBIT ONE

EXHIBIT 1

CURRICULUM VITAE OF LAWRENCE G. PAPALE

Graduated from Stanford University in 1972 with a Bachelor of Arts degree and from the University of San Francisco in 1975 with a Juris Doctor degree.

First admitted to practice before the California courts and before the U.S. District Court for Northern District of California in November, 1975. I have been admitted to practice before various federal district courts throughout the country, including the Southern District of California, the Eastern District of California, the Southern District of New York and the Districts of Tennessee and Massachusetts, as well as the federal appellate courts of the Second, Fifth, Sixth and Ninth Circuits. Since 1975, I have specialized in antitrust law, unfair competition, business and corporate law and real estate. I was associated with the Alioto Law Firm from 1975 to 1985; I was a partner in the Law Offices of Cannata & Papale from 1985 to 1995; and I presently practice in my own law firm in St. Helena, California, the Law Offices of Lawrence G. Papale. I have participated as counsel in numerous antitrust and unfair competition cases.

I have tried the following antitrust cases: Rickards vs. CERF (USDC NDCal), Las Vegas Sun vs. Summa Corp (USDC DNeV), Broadway Delivery vs. United Parcel Service (USDC SDNY), Ringsby vs. Yellow Freight Co. (USDC NDCal), Balmoral Cinema, Inc. vs. Allied Artists Pictures Corp., et al. (USDC WDTenn).

I have participated in numerous antitrust and unfair competition class actions, including the following:

- California Potash Litigation
- California Sodium Erythorbate Litigation
- California Maltol Litigation
- California Food Additives Litigation
- Federal Aspartame Litigation
- Federal OSB Litigation
- California Labels Antitrust Litigation
- Auto Antitrust Cases
- Airline Antitrust Cases
- California Linens Litigation
- California Pitney Bowes Litigation

California Popcorn Litigation
Household Lending Litigation
California Flat Glass Litigation
California Laminates Litigation
Bathroom Fittings Litigation
California Neoprene Litigation
Peralta vs. Wells Fargo California Litigation
Copper Tubing Antitrust Litigation
CRT Antitrust Litigation
LCD Antitrust Litigation
Chocolate Antitrust Litigation
Filters Antitrust Litigation
Korean Air Antitrust Litigation
Graphics Antitrust Litigation
SRAM Antitrust Litigation
Packaged Ice Antitrust Litigation
Optical Disk Drive Antitrust Litigation
Lipitor Antitrust Litigation
VISA Bankcard Litigation

EXHIBIT TWO

TIME AND LODESTAR SUMMARY

INDIRECT PURCHASER PLAINTIFFS

Firm Name	LAW OFFICES OF LAWRENCE G. PAPALE
Reporting Year	2007

[illegible]

TIME AND LODESTAR SUMMARY

INDIRECT PURCHASER PLAINTIFFS

Firm Name	LAW OFFICES OF LAWRENCE G. PAPALE
Reporting Year	2008

[illegible]

TIME AND LODESTAR SUMMARY

INDIRECT PURCHASER PLAINTIFFS

Firm Name	LAW OFFICES OF LAWRENCE G. PAPALE
Reporting Year	2009

[illegible]

TIME AND LODESTAR SUMMARY

INDIRECT PURCHASER PLAINTIFFS

Firm Name	LAW OFFICES OF LAWRENCE G. PAPALE
Reporting Year	2010

[illegible]

TIME AND LODESTAR SUMMARY

INDIRECT PURCHASER PLAINTIFFS

Firm Name	LAW OFFICES OF LAWRENCE G. PAPALE
Reporting Year	2011

Name/Status	Hourly Rate	1	2	3	4	5	6	7	8	9	10	11	12	Hours	Lodestar
Lawrence Papale	\$ 650.00	4.7		5.5	43.0			6.5						59.7	\$ 38,805.00
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		4.7	0.0	5.5	43.0	0.0	0.0	6.5	0.0	0.0	0.0	0.0	0.0	59.7	\$ 38,805.00

TIME AND LODESTAR SUMMARY

INDIRECT PURCHASER PLAINTIFFS

Firm Name	LAW OFFICES OF LAWRENCE G. PAPALE
Reporting Year	2012

[illegible]

TIME AND LODESTAR SUMMARY

INDIRECT PURCHASER PLAINTIFFS

Firm Name	LAW OFFICES OF LAWRENCE G. PAPALE
Reporting Year	2013

[illegible]

TIME AND LODESTAR SUMMARY

INDIRECT PURCHASER PLAINTIFFS

Firm Name	LAW OFFICES OF LAWRENCE G. PAPALE
Reporting Year	2014

Name/Status	Hourly Rate	1	2	3	4	5	6	7	8	9	10	11	12	Hours	Lodestar
Lawrence Papale	\$ 750.00	12.2				26.4		11.8	17.6				90.0	158.0	\$ 118,500.00
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		12.2	0.0	0.0	0.0	26.4	0.0	11.8	17.6	0.0	0.0	0.0	90.0	158.0	\$ 118,500.00

TIME AND LODESTAR SUMMARY

INDIRECT PURCHASER PLAINTIFFS

Firm Name	LAW OFFICES OF LAWRENCE G. PAPALE
Reporting Year	2015

[illegible]

EXHIBIT 2

IN RE CATHODE RAY TUBE (CRT) ANTITRUST LITIGATION; MDL NO. 1917

Firm Name	Law Offices of Lawrence G. Papale	TIME AND LODESTAR SUMMARY
Reporting Year	Inception through Present	INDIRECT PURCHASER PLAINTIFFS

Year		1	2	3	4	5	6	7	8	9	10	11	12	Hours	Lodestar
2007	P	4.5	0.0	2.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	6.5	\$ 3,225.00
2008	P	14.3	0.0	8.5	9.6	0.0	12.6	0.0	0.0	4.0	0.0	0.0	0.0	49.0	\$ 24,500.00
2009	P	12.6	9.8	6.1	0.0	0.0	0.0	13.4	0.0	9.5	9.0	0.0	0.0	60.4	\$ 39,260.00
2010	P	0.0	0.0	5.9	37.1	0.0	0.0	0.0	0.0	6.1	0.0	0.0	0.0	49.1	\$ 31,915.00
2011	P	4.7	0.0	5.5	43.0	0.0	0.0	6.5	0.0	0.0	0.0	0.0	0.0	59.7	\$ 38,805.00
2012	P	15.3	0.0	18.5	0.0	200.0	193.2	55.0	0.0	7.9	0.0	0.0	0.0	489.9	\$ 318,435.00
2013	P	23.0	0.0	4.5	15.0	100.0	149.0	26.5	0.0	11.0	0.0	0.0	0.0	329.0	\$ 230,300.00
2014	P	12.2	0.0	0.0	0.0	26.4	0.0	11.8	17.6	0.0	0.0	0.0	90.0	158.0	\$ 118,500.00
2015	P	7.3	0.0	2.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	50.4	60.4	\$ 45,300.00
		93.9	9.8	53.7	104.7	326.4	354.8	113.2	17.6	38.5	9.0	0.0	140.4	1262.0	\$ 850,240.00

STATUS:

(P) Partner
(OC) Of Counsel
(A) Associate
(LC) Law Clerk
(PL) Paralegal
(I) Investigator

CATEGORIES:

1 Attorney Meeting/Strategy
2 Court Appearance
3 Client Meeting
4 Draft Discovery Requests or Responses
5 Deposition Preparation
6 Attend Deposition - Conduct/Defend
7 Document Review
8 Experts - Work or Consult
9 Research
10 Motions/Pleadings
11 Settlement
12 Trial

EXHIBIT THREE

IN RE CATHODE RAY TUBE (CRT) ANTITRUST LITIGATION; MDL NO. 1917

EXPENSE SUMMARY

INDIRECT PURCHASER PLAINTIFFS

Firm Name	LAW OFFICES OF LAWRENCE G. PAPALE
Reporting Year	Inception through Present

TYPE OF EXPENSE		TOTAL
Assessments		
Outside Copies		
In-house Reproduction /Copies		\$ 274.00
Court Costs & Filing Fees		
Court Reporters 7 Transcripts		\$ 483.00
Computer Research		\$ 107.54
Telephone & Facsimile		\$ 137.00
Postage/Express Delivery/Courier		
Professional Fees (investigator, accountant, etc.)		
Experts		
Witness / Service Fees		
Travel: Airfare		\$ 11,646.00
Travel: Lodging/Meals		\$ 11,877.49
Travel: Other		
Car Rental/Cabfare/Parking		\$ 98.00
Other Expenses		
		\$ 24,623.03